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KATIE SZPYRKA

*\* Motion for admission pro hac vice to be filed*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

KATIE SZPYRKA, individually and on  
behalf of all others similarly situated,  
  
Plaintiff,  
  
v.  
  
LINKEDIN CORPORATION, a Delaware  
Corporation,  
  
Defendant.

Case No. 12-CV-3088 EJD

**STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT  
(Civ. L.R. 6-1(a))**

Courtroom: 4, 5th Floor  
Judge: Hon. Edward J. Davila  
Trial Date: None Set

1 This Stipulation is entered into by and among plaintiff Katie Szpyrka (“Plaintiff”) and  
 2 defendant LinkedIn Corporation (“LinkedIn”) (Plaintiff and LinkedIn collectively the “Parties”),  
 3 by and through their respective counsel.

4 WHEREAS Plaintiff filed a Complaint in the above-entitled action in the United States  
 5 District Court for the Northern District of California on June 15, 2012;

6 WHEREAS a Waiver of the Service of Summons form, executed by LinkedIn’s counsel,  
 7 has been filed;

8 WHEREAS the current deadline for LinkedIn to answer, move, or otherwise respond to  
 9 the Complaint is August 14, 2012 (60 days from the date on which Plaintiffs sent the request for  
 10 waiver of service to LinkedIn);

11 WHEREAS, including this action, there are a total of four related actions that have been  
 12 filed in the United States District Court for the Northern District of California (collectively the  
 13 “Related Actions”), with this action being the first-filed and lowest-numbered action;

14 WHEREAS the three other Related Actions are captioned *Paraggua v. LinkedIn Corp.*,  
 15 Case No. 12-CV-3430 EDL; *Shepherd v. LinkedIn Corp.*, Case No. 12-CV-3422 JSC; and *Veith*  
 16 *v. LinkedIn Corp.*, Case No. 12-CV-3557 PSG;

17 WHEREAS, on July 16, 2012, on the docket in this action (Dkt. No. 12), the plaintiffs in  
 18 the four Related Actions jointly filed a Motion to Consolidate and Appoint Interim Lead Class  
 19 Counsel and Liaison Class Counsel (the “Motion to Consolidate”), in which all plaintiffs jointly  
 20 moved the Court to consolidate the four Related Actions into the *Szpyrka* action before this Court  
 21 (the Honorable Edward J. Davila), to grant leave to file a consolidated amended complaint, and to  
 22 appoint interim lead class counsel and liaison class counsel;

23 WHEREAS LinkedIn supports consolidation of the Related Actions and the filing of a  
 24 consolidated amended complaint;

25 WHEREAS, in light of the pendency of the Motion to Consolidate jointly filed by the  
 26 plaintiffs in all four Related Actions and LinkedIn’s support for consolidation, the Parties believe  
 27 that the interests of efficiency and judicial and party economy are best served by not requiring  
 28 LinkedIn to file a response to the complaint in each of the four Related Actions, and, instead, are

**STIP. TO EXTEND TIME TO RESPOND TO COMPL.**  
**CASE NO. 12-CV-3088-EJD**

best served by waiting for the consolidated amended complaint to be filed before requiring LinkedIn to file a response;

WHEREAS under Civil Local Rule 6-1(a), parties may stipulate in writing, without a court order, to extend the time within which to answer or otherwise respond to a complaint;

WHEREAS extending the date for LinkedIn to respond to the Complaint as set forth below will not alter the date of any event or deadline already fixed by Court order;

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. LinkedIn's deadline to answer, move, or otherwise respond to the Complaint in this action—currently August 14, 2012—is stayed pending the Court's ruling on the plaintiffs' Motion to Consolidate.

2. If the Motion to Consolidate is granted, LinkedIn will no longer have an obligation to answer, move, or otherwise respond to the Complaint in this action, and instead must answer, move, or otherwise respond to the consolidated amended complaint within 45 days after the deadline for the plaintiffs in the Related Actions to file the consolidated amended complaint.

3. In the event that the Motion to Consolidate is denied, LinkedIn's deadline to answer, move, or otherwise respond to the current operative Complaint in this action will be 45 days after the date on which the Court's order denying the Motion to Consolidate is filed.

**IT IS SO STIPULATED.**

Dated: July 20, 2012

COOLEY LLP

By: /s/ Matthew D. Brown  
Matthew D. Brown (196972)

Attorneys for Defendant LINKEDIN CORP.

Dated: July 20, 2012

EDELSON MCGUIRE LLP

By: /s/ Sean P. Reis  
Sean P. Reis (184044)

Attorneys for Plaintiff KATIE SZPYRKA

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), I, Matthew D. Brown, attest that concurrence in the filing of this document has been obtained from each of the other signatories.

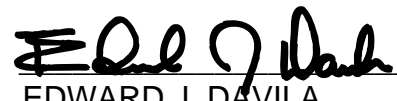
Dated: July 20, 2012

/s/ Matthew D. Brown  
Matthew D. Brown

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The stipulation is DENIED WITHOUT PREJUDICE. Before the court will consider extending Defendant's time to respond to the Complaint, and before the court will consider consolidating this case with cases not already assigned to Judge Davila, the parties must file and obtain a ruling on an administrative motion to consider whether cases should be related pursuant to Civil Local Rule 3-12(b).

DATED: July 23, 2012

  
EDWARD J. DAVILA  
United States District Judge